

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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IN RE PHARMACEUTICAL INDUSTRY	)	
AVERAGE WHOLESALE PRICE	)	MDL NO. 1456
LITIGATION	)	Civil Action No. 01-12257-PBS
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THIS DOCUMENT RELATES TO:	)	
	)	
International Union of Operating	)	
Engineers, Local No. 68 Welfare	)	
Fund v. AstraZeneca PLC at al.	)	
Civil Action No. 04-11503-PBS	)	
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**DEFENDANTS BOEHRINGER INGELHEIM CORPORATION,  
BEN VENUE LABORATORIES, INC./BEDFORD LABORATORIES, AND  
BOEHRINGER INGELHEIM ROXANE, INC.'S LOCAL RULE 16.1(D)(3)  
CERTIFICATION**

Pursuant to Local Rule 16.1(D)(3), Defendants Boehringer Ingelheim Corporation, Ben Venue Laboratories, Inc./Bedford Laboratories, Roxane Laboratories, Inc. now known as Boehringer Ingelheim Roxane, Inc., and their attorneys hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course—and various alternative courses—for the above-captioned litigation and have conferred to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

BOEHRINGER INGELHEIM  
CORPORATION, BEN VENUE  
LABORATORIES, INC./BEDFORD  
LABORATORIES, AND BOEHRINGER  
INGELHEIM ROXANE, INC.

/s/ Paul J. Coval  
Paul J. Coval  
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/s/ Sheila Denton  
Sheila Denton  
Senior Counsel

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all  
enrolled counsel via Verilaw on April 13, 2004 pursuant to this Court's Case Management Order 2.

/s/ Paul J. Coval  
Paul J. Coval